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Atty Docket No. 080398.P427

Patent

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In re Application of:	) Examiner:	Nguyen, Huy Thanh
	)	
Hawley K Rising, et al.	) Art Unit:	2621
	)	
Application No. 10/005,252	) Confirmation No.:	9370
	)	
Filed: December 3, 2001	)	
	)	
For: Distributed Semantic	)	
Descriptions Of Audiovisual	)	
Content	)	

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Commissioner for Patents  
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Alexandria, VA 22313-1450

**APPEAL BRIEF UNDER 37 C.F.R. § 41.37**

This is an appeal to the Board of Patent Appeals and Interferences from the decision of the Examiner of Group 2621, dated August 9, 2007, in which claims 1-41 in the above-identified application were rejected in a final Office Action. This Appeal Brief is hereby submitted pursuant to 37 C.F.R. § 41.37(a).

**I. REAL PARTY IN INTEREST**

The real party in interest is the assignee of the full interest in the invention, Sony Corporation, Tokyo, Japan, and Sony Electronics Inc, Park Ridge, New Jersey.

**II. RELATED APPEALS AND INTERFERENCES**

To the best of Appellant's knowledge, there are no appeals or interferences related to the present appeal that will directly affect, be directly affected by, or have a bearing on the Board's decision in the instant appeal.

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### **III. STATUS OF THE CLAIMS**

Claims 1-41 are pending in the application and were rejected in the final Office Action mailed August 9, 2007. Claims 1-41 are the subject of this appeal. A copy of Claims 1-41 as they stand on appeal are set forth in the Claims Appendix.

### **IV. STATUS OF AMENDMENTS**

No amendments to the claims have been made after receipt of the Final Office Action.

### **V. SUMMARY OF CLAIMED SUBJECT MATTER**

Appellant's invention as claimed in claims 1-8, 21-29, 37-39 and 41 creates a first description that describes a concept depicted in existing audiovisual content and which can be reused to create a second description that describes a similar concept depicted in new audiovisual content. Applicant's invention as claimed in claims 9-20, 30-36 and 40 finds existing descriptive data that describes a concept depicted in existing audiovisual data that is similar to a concept depicted in new audiovisual content and which can be used to create a new description. All citations to the specification refer to the specification as filed, not to the specification as published. Appellant directs the Board attention to the following typographical errors discovered in preparing this brief. On page 16, line 21, the correct reference number for reuse information creator 119 is 110 as shown in Figure 1. In Figure 4, the correct reference number for data repository 104 in client 112 is 114 as evidenced on page 16, lines 8-9. Appellant apologizes for any confusion caused by these errors and will correct them after the appeal process is concluded.

Independent claim 1 claims a method that creates a first description describing a concept depicted in an existing audiovisual content [page 17, lines 6-21, Figure 5: 504] and defines information pertaining to reuse of the first description [page 17, line 23 through page 18, line 12, Figure 5: 506]. Claim 1 further claims storing the first description and the information pertaining to reuse of the first description in a repository of descriptive data to enable subsequent reuse of the first description [page 18, lines 13-23, Figure 5: 508] to create a second description that describes a similar concept depicted

in a new audiovisual content [page 18, lines 1-12, page 20, line 9 through page 21, line 3].

Independent claim 9 is claims a method that finds existing descriptive data describing a concept depicted in an existing audiovisual data that is similar to a concept depicted in a new audiovisual content [page 19, lines 2-13, Figure 6: 604]. Claim 9 further claims analyzing reuse information associated with the descriptive data [page 19, lines 14-18, Figure 6: 606, page 17, line 23 through page 18, line 12], and creating a new description using the existing descriptive data and the associated reuse information [page 19, line 23 through page 20, line 8, Figure 6: 608].

Independent claim 21 claims a method that creates a first description that describes a concept depicted in an existing audiovisual content [page 23, lines 2-3, Figure 7: 704, page 17, lines 6-21] and defines reuse information associated with the first description [page 23, lines 3-4, Figure 7: 706, page 17, lines 23 through page 18, line 12]. Independent claim 21 further claims reusing the first description to create a second description that describes a similar concept depicted in a modified audiovisual content in accordance with the reuse information, the reuse being performed concurrently with creation of the modified audiovisual content [page 23, lines 7-21, Figure 7: 708].

Independent claim 22 claims a system under 35 U.S.C. § 112, sixth paragraph. Independent claim 22 claims means for creating a first description that describes a concept depicted in existing audiovisual content [page 16, lines 19-21, Figure 4: 108; page 17, lines 6-21, Figure 5: 504], means for defining information pertaining to reuse of the first description [page 19, line 21 through page 20, line 1, Figure 4: 110; page 17, line 23 through page 18, line 12, Figure 5: 506], and means for storing the first description and the information pertaining to reuse of the first description in a repository of descriptive data to enable subsequent reuse of the first description [page 17, lines 1-5, Figure 4: 104, 114 (as corrected); page 18, lines 13-23, Figure 5: 508] to create a second description that describes a similar concept depicted in a new audiovisual content [page 18, lines 1-12, page 20, line 9 through page 21, line 3].

Independent claim 23 claims an apparatus comprising a description processor to create a first description that describes a concept depicted in an existing audiovisual content [page 16, lines 19-21, Figure 4: 108], a reuse information creator to define

information pertaining to reuse of the first description [page 19, line 21 through page 20, line 1, Figure 4: 110], and a repository of descriptive data to store the first description and the information pertaining to reuse of the first description to enable subsequent reuse of the first description [page 17, lines 1-5, Figure 4: 104, 114 (as corrected)] to create a second description that describes a similar concept depicted in a new audiovisual content [page 18, lines 1-12, page 20, line 9 through page 21, line 3].

Independent claim 30 claims a system under 35 U.S.C. § 112, sixth paragraph. Independent claim 30 claims means for finding existing descriptive data that describes a concept depicted in an existing audiovisual data that is similar to a concept depicted in a new audiovisual content [page 16, lines 10-16, Figure 4: 106; page 19, lines 2-13, Figure 6: 604], means for analyzing reuse information associated with the descriptive data [page 16, lines 16-18, Figure 4: 106; page 19, lines 14-18, Figure 6: 606, page 17, line 23 through page 18, line 12], and means for creating a new description using the existing descriptive data and the associated reuse information [page 16, lines 19-21, Figure 4: 108; page 19, line 23 through page 20, line 8, Figure 6: 608].

Independent claim 31 claims an apparatus comprising a reuse module to find existing descriptive data that describes a concept depicted in an existing audiovisual data that is similar to a concept depicted in a new audiovisual content [page 16, lines 10-16, Figure 4: 106], and to analyze reuse information associated with the descriptive data [page 16, lines 16-18, Figure 4: 106], and a description processor to create a new description using the existing descriptive data and the associated reuse information [page 16, lines 19-21, Figure 4: 108].

Independent claim 37 claims a system under 35 U.S.C. § 112, sixth paragraph. Claim 37 claims means for creating a first description that describes a concept depicted in an existing audiovisual content [page 16, lines 19-21, Figure 4: 108; page 23, lines 2-3, Figure 7: 704, page 17, lines 6-21], means for defining reuse information associated with the first description [page 19, line 21 through page 20, line 1, Figure 4: 110; page 23, lines 3-4, Figure 7: 706, page 17, lines 23 through page 18, line 12], and means for reusing the first description to create a second description that describes a similar concept depicted in a modified audiovisual content in accordance with the reuse information, the

reuse being performed concurrently with creation of the modified audiovisual content [page 16, lines 19-21, Figure 4: 108; page 23, lines 7-21, Figure 7: 708].

Independent claim 38 claims an apparatus comprising a description processor to create a first description that describes a concept depicted in an existing audiovisual content [page 16, lines 19-21, Figure 4: 108, page 17, lines 6-21], and a reuse information creator to define reuse information associated with the first description [page 19, line 21 through page 20, line 1, Figure 4: 110, , page 17, lines 23 through page 18, line 12], the description processor to reuse the first description to create a second description that describes a similar concept depicted in a modified audiovisual content in accordance with the reuse information, the reuse being performed concurrently with creation of the modified audiovisual content [page 16, lines 19-21, Figure 4: 108].

Independent claim 39 claims a computer readable medium providing executable instructions [page 26, lines 3-5; Figure 9: 904] to cause a processor [page 25, line 16, Figure 9: 902] to perform operations comprising creating a first description that describes a concept depicted in an existing audiovisual content [page 17, lines 6-21, Figure 5: 504], defining information pertaining to reuse of the first description [page 17, line 23 - page 18, line 12, Figure 5: 506], and storing the first description and the information pertaining to reuse of the first description in a repository of descriptive data to enable subsequent reuse of the first description [page 18, lines 13-23, Figure 5: 508] to create a second description that describes a similar concept depicted in a new audiovisual content [page 18, lines 1-12, page 20, line 9 through page 21, line 3].

Independent claim 40 claims a computer readable medium providing executable instructions [page 26, lines 3-5; Figure 9: 904] to cause a processor [page 25, line 16, Figure 9: 902] to perform operations comprising finding existing descriptive data that describes a concept depicted in an existing audiovisual data that is similar to a concept depicted in a new audiovisual content [page 19, lines 2-13, Figure 6: 604], analyzing reuse information associated with the descriptive data [page 19, lines 14-18, Figure 6: 606, page 17, line 23 through page 18, line 12], and creating a new description using the existing descriptive data and the associated reuse information [page 19, line 23 through page 20, line 8, Figure 6: 608].

Independent claim 41 claims a computer readable medium providing executable instructions [page 26, lines 3-5; Figure 9: 904] to cause a processor [page 25, line 16, Figure 9: 902] to perform operations comprising creating a first description that describes a concept depicted in an existing audiovisual content [page 23, lines 2-3, Figure 7: 704, page 17, lines 6-21], defining reuse information associated with the first description [page 23, lines 3-4, Figure 7: 706, page 17, lines 23 through page 18, line 12], and reusing the first description to create a second description that describes a similar concept depicted in a modified audiovisual content in accordance with the reuse information, the reuse being performed concurrently with creation of the modified audiovisual content [page 23, lines 7-21, Figure 7: 708].

Dependent claim 16 depends from claim 1 and further claims that the claim 1 element of creating the new description further comprises performing dictionary mapping of objects in the existing descriptive data to corresponding objects in the new description [page 21, lines 4-15].

## **VI. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL**

I. Claims 1-15, 17, 20-34 and 37-41 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Sekiguchi, et al., U.S. Patent 6,665,442.

II. Claims 16, 18, 19, 35 and 36 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Sekiguchi in view of Official Notice that dictionary mapping, graph operations and object-oriented inheritance graphs are well known.

## **VII. ARGUMENTS**

I. Claims 1-15, 17, 20-34 and 37-41 are patentable under 35 U.S.C. § 102(e) over Sekiguchi.

Sekiguchi discloses an image retrieval system that extracts characteristic data for an image and stores the characteristic data along with the image for subsequent use in searching for similar images. In a first embodiment shown in Figure 2, the characteristic data is stored as “characteristic descriptor sets” (illustrated in Figure 10), which describe motion vectors, and luminance and color signals of the corresponding images. A characteristic description data set may also include a specific characteristics description

that expresses, for example, a team name for a player or a relationship between persons displayed in a picture. The characteristic descriptor sets are searched to retrieve images having a characteristic similar to a retrieval condition input by a user. In a second embodiment shown in Figure 15, characteristic data describing motion, brightness and color is stored as “for-retrieval description data,” along with a numerical value that indicates the degree of reliability of the description data (illustrated in Figure 18). The for-retrieval description data is searched in a similar fashion as the characteristic descriptor sets but retrieves only those images having a high degree of reliability.

**A. Claims 1-15, 17, 20, 22-34 and 38-40**

Claims 1-15, 17, 20, 22-34 and 38-40 stand or fall together. Claim 1 is the representative claim.

The Examiner appears to be equating Sekiguchi’s characteristics descriptor set with Appellant’s claimed first description that describes a concept depicted in an existing audiovisual content. The Examiner further appears to be equating Sekiguchi’s for-retrieval description data with Appellant’s claimed second description that is created by reusing the first description and describes a similar concept depicted in a new audiovisual content.

However, Sekiguchi does not disclose that the for-retrieval description data includes any data other than motion, brightness and color information. Therefore, Sekiguchi cannot be properly interpreted as disclosing Appellant’s claimed second description that describes a concept depicted in content. In addition, although a characteristic descriptor set or for-retrieval description data for an image are both created from characteristic data extracted from the image, Sekiguchi does not even suggest that for-retrieval description data for a new image is created by reusing a characteristic descriptor set for an existing image. Therefore, Sekiguchi cannot be properly interpreted as disclosing Appellant’s claimed second description that is created by reusing the first description, where the second description describes a similar concept depicted in a new audiovisual content.

Moreover, the Examiner stated that Appellant’s claimed descriptions are disclosed by Sekiguchi because “Sekiguchi teaches the description that describes the concept of audio visual content since the description is used by different users having different

concepts” [Final Office Action: page 7, lines 8-10 (grammar errors in the original)]. Appellant respectfully points out that different users having different concepts is irrelevant to the issue of whether Sekiguchi discloses reusing of a first description to create a second description that describes a similar concept depicted in a new audiovisual content as claimed by Appellant.

Furthermore, Appellant respectfully submits that the Examiner’s use of column 44 in Sekiguchi to reject Appellant’s claim 1 is improper because claim 44 contains only claims, and rejections should cite to the detailed description of a prior art reference. In addition, the Examiner did not particularize his rejection using specific claims or claim elements in column 44, so it is unclear on which portions of column 44 the Examiner is relying.

Accordingly, Appellant respectfully submits that the invention claimed in claims 1-15, 17, 20, 22-34 and 38-40 is not anticipated by Sekiguchi under 35 U.S.C. § 102(e).

***B. Claims 21, 37 and 41***

Claims 21, 37 and 41 stand or fall together. Claim 21 is the representative claim and particularly claims that the reuse of a first description to create a second description is performed concurrently with creation of modified audiovisual content described by the second description.

In his rejection of claim 21, the Examiner has failed to consider Appellant’s claim limitation of description reuse that is concurrent with content creation, and has not cited any portion of Sekiguchi as disclosing the claimed limitation. In fact, Appellant respectfully submits there is nothing in Sekiguchi that even suggests the claimed limitation.

Accordingly, Appellant respectfully submits that the invention claimed in claims 21, 37 and 41 is not anticipated by Sekiguchi under 35 U.S.C. § 102(e).

**II. Claims 16, 18, 19, 35 and 36 are patentable under 35 U.S.C. § 103(a) over Sekiguchi in view of the Official Notice asserted by the Examiner.**

Claims 16, 18, 19, 35 and 36 stand or fall together. Claim 16 is the representative claim and depends from independent claim 1.



Sekiguchi does not teach or suggest Appellant's claimed descriptions that describe concepts depicted in audiovisual content in claim 1. The Examiner's asserted Official Notice does not teach or suggest Appellant's claimed descriptions that describe concepts depicted in audiovisual content. Therefore, the combination of Sekiguchi and Official Notice cannot be properly interpreted as disclosing each and every limitation of Applicant's invention as claimed in claim 16.

Accordingly, Appellant respectfully submits that Appellant's invention as claimed in claims 16, 18, 19, 35 and 36 is not rendered obvious by Sekiguchi in view of the Official Notice asserted by the Examiner.

### **VIII. CONCLUSION**

Appellant's invention as claimed in claims 1-15, 17, 20, 22-34 and 38-40, and claims 21, 37 and 41 is not anticipated by Sekiguchi under 35 U.S.C. § 102(e). Appellant's invention as claimed in claims 16, 18, 19, 35 and 36 is not rendered obvious by Sekiguchi in view of Official Notice.

Therefore, Appellant respectfully requests the Board reverse the rejections of claims 1-15, 17, 20-34 and 37-41 under 35 U.S.C. § 102, and the rejections of claims 16, 18, 19, 35 and 36 under 35 U.S.C. § 103, and direct the Examiner to enter a Notice of Allowance for claims 1-41.

#### **Fee for Filing a Brief in Support of Appeal**

Enclosed is a check in the amount of \$510.00 to cover the fee for filing a brief in support of an appeal as required under 37 C.F.R. §§ 1.17(c) and 41.37(a).

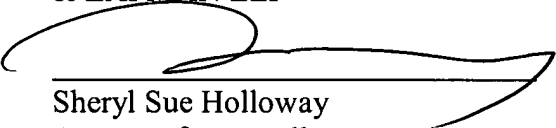
**Deposit Account Authorization**

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Appellant hereby requests such extension.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR  
& ZAFMAN LLP

Dated: Jan. 8, 2008



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## CLAIMS APPENDIX

1. (Previously presented) A method for processing descriptions of audiovisual content, the method comprising:
  - creating a first description that describes a concept depicted in an existing audiovisual content;
  - defining information pertaining to reuse of the first description; and
  - storing the first description and the information pertaining to reuse of the first description in a repository of descriptive data to enable subsequent reuse of the first description to create a second description that describes a similar concept depicted in a new audiovisual content.
2. (Original) The method of claim 1 wherein the first description is a semantic description.
3. (Original) The method of claim 1 wherein the first description is a description scheme.
4. (Previously presented) The method of claim 1 wherein the information pertaining to reuse of the first description indicates whether the first description can be embedded into the second description without changing an intended meaning of the first description.
5. (Original) The method of claim 1 wherein the information pertaining to reuse of the first description indicates whether the first description can be divided into a plurality of partial descriptions, each of the plurality of partial descriptions being suitable for subsequent reuse.
6. (Previously presented) The method of claim 1 wherein the information pertaining to reuse of the first description indicates whether the first description can be transformed when reused to create the second description.

7. (Previously presented) The method of claim 1 wherein the information pertaining to reuse of the first description indicates whether the first description can maintain transitive capability when the first description is reused to create the second description.

8. (Original) The method of claim 1 further comprising:

reusing a plurality of descriptions stored in one or more repositories of descriptive data a number of times to provide de facto standardization of the plurality of descriptions by category.

9. (Previously presented) A method for reusing descriptions of audiovisual content, the method comprising:

finding existing descriptive data that describes a concept depicted in an existing audiovisual data that is similar to a concept depicted in a new audiovisual content;

analyzing reuse information associated with the descriptive data; and

creating a new description using the existing descriptive data and the associated reuse information.

10. (Original) The method of claim 9 wherein the new description is a semantic description.

11. (Original) The method of claim 9 wherein the new description is a description scheme.

12. (Original) The method of claim 9 wherein the descriptive data is at least a portion of one or more existing descriptions of audiovisual content.

13. (Original) The method of claim 9 further comprising:

retrieving the descriptive data from one or more repositories of descriptive data.

14. (Original) The method of claim 9 wherein creating the new description further comprises:

converting the existing descriptive data into a partial description; and  
mapping the partial description to the new description.

15. (Original) The method of claim 9 wherein creating the new description further comprises:

accessing a portion of the existing descriptive data in a repository of descriptive data; and  
mapping the portion of the existing descriptive data to the new description.

16. (Original) The method of claim 9 wherein creating the new description further comprises:

performing dictionary mapping of objects in the existing descriptive data to corresponding objects in the new description.

17. (Original) The method of claim 9 wherein creating the new description further comprises:

including a reference to the existing descriptive data into the new description.

18. (Original) The method of claim 9 wherein the new description is created using a mechanism for performing graph operations.

19. (Original) The method of claim 9 wherein the new description is created using an object oriented inheritance mechanism.

20. (Original) The method of claim 9 wherein creating the new description further comprises:

extracting the existing descriptive data from a semantic mosaic that integrates a plurality of related descriptions.

21. (Previously presented) A method for dynamically reusing descriptions of audiovisual content, the method comprising:

- creating a first description that describes a concept depicted in an existing audiovisual content;
- defining reuse information associated with the first description; and
- reusing the first description to create a second description that describes a similar concept depicted in a modified audiovisual content in accordance with the reuse information, the reuse being performed concurrently with creation of the modified audiovisual content.

22. (Previously presented) A system for processing descriptions of audiovisual content, the system comprising:

- means for creating a first description that describes a concept depicted in existing audiovisual content;
- means for defining information pertaining to reuse of the first description; and
- means for storing the first description and the information pertaining to reuse of the first description in a repository of descriptive data to enable subsequent reuse of the first description to create a second description that describes a similar concept depicted in a new audiovisual content.

23. (Previously presented) An apparatus comprising:

- a description processor to create a first description that describes a concept depicted in an existing audiovisual content;
- a reuse information creator to define information pertaining to reuse of the first description; and
- a repository of descriptive data to store the first description and the information pertaining to reuse of the first description to enable subsequent reuse of the first description to create a second description that describes a similar concept depicted in a new audiovisual content.

24. (Original) The apparatus of claim 23 wherein the first description is a semantic description.
25. (Original) The apparatus of claim 23 wherein the first description is a description scheme.
26. (Original) The apparatus of claim 23 wherein the information pertaining to reuse of the first description indicates whether the first description can be embedded into a second description of audiovisual content without changing an intended meaning of the first description.
27. (Original) The apparatus of claim 23 wherein the information pertaining to reuse of the first description indicates whether the first description can be divided into a plurality of partial descriptions, each of the plurality of partial descriptions being suitable for subsequent reuse.
28. (Original) The apparatus of claim 23 wherein the information pertaining to reuse of the first description indicates whether the first description can be transformed when reused to create a second description of audiovisual content.
29. (Original) The apparatus of claim 23 wherein the information pertaining to reuse of the first description indicates whether the first description can maintain transitive capability if the first description is reused to create a second description of audiovisual content.
30. (Previously presented) A system for reusing descriptions of audiovisual content, the system comprising:
- means for finding existing descriptive data that describes a concept depicted in an existing audiovisual data that is similar to a concept depicted in a new audiovisual content;
  - means for analyzing reuse information associated with the descriptive data; and

means for creating a new description using the existing descriptive data and the associated reuse information.

31. (Previously presented) An apparatus comprising:

a reuse module to find existing descriptive data that describes a concept depicted in an existing audiovisual data that is similar to a concept depicted in a new audiovisual content ,and to analyze reuse information associated with the descriptive data; and

a description processor to create a new description using the existing descriptive data and the associated reuse information.

32. (Original) The apparatus of claim 31 wherein the new description is a semantic description.

33. (Original) The apparatus of claim 31 wherein the new description is a description scheme.

34. (Original) The apparatus of claim 31 wherein the descriptive data is at least a portion of one or more existing descriptions of audiovisual content.

35. (Original) The apparatus of claim 31 wherein the new description is created using a mechanism for performing graph operations.

36. (Original) The apparatus of claim 31 wherein the new description is created using an object oriented inheritance mechanism.

37. (Previously presented) A system for dynamically reusing descriptions of audiovisual content, the method comprising:

means for creating a first description that describes a concept depicted in an existing audiovisual content;

means for defining reuse information associated with the first description; and



means for reusing the first description to create a second description that describes a similar concept depicted in a modified audiovisual content in accordance with the reuse information, the reuse being performed concurrently with creation of the modified audiovisual content.

38. (Previously presented) An apparatus comprising:

- a description processor to create a first description that describes a concept depicted in an existing audiovisual content; and

- a reuse information creator to define reuse information associated with the first description, the description processor to reuse the first description to create a second description that describes a similar concept depicted in a modified audiovisual content in accordance with the reuse information, the reuse being performed concurrently with creation of the modified audiovisual content.

39. (Previously presented) A computer readable medium encoded with computer program instructions, which when executed on a processor, cause said processor to perform operations comprising:

- creating a first description that describes a concept depicted in an existing audiovisual content;

- defining information pertaining to reuse of the first description; and

- storing the first description and the information pertaining to reuse of the first description in a repository of descriptive data to enable subsequent reuse of the first description to create a second description of a similar concept depicted in a new audiovisual content.

40. (Previously presented) A computer readable medium encoded with computer program instructions, which when executed on a processor, cause said processor to perform operations comprising:

- finding existing descriptive data that describes a concept depicted in an existing audiovisual data that is similar to a concept depicted in a new audiovisual content;

- analyzing reuse information associated with the descriptive data; and

creating a new description using the existing descriptive data and the associated reuse information.

41. (Previously presented) A computer readable medium encoded with computer program instructions, which when executed on a processor, cause said processor to perform operations comprising:

- creating a first description that describes a concept depicted in an existing audiovisual content;

- defining reuse information associated with the first description; and

- reusing the first description to create a second description that describes a similar concept depicted in a modified audiovisual content in accordance with the reuse information, the reuse being performed concurrently with creation of the modified audiovisual content.

## **EVIDENCE APPENDIX**

NONE

## **RELATED PROCEEDINGS APPENDIX**

NONE